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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

14 IN RE: UBER TECHNOLOGIES, INC.,  
15 PASSENGER SEXUAL ASSAULT  
16 LITIGATION

17 This Document Relates to:

18 ALL ACTIONS

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER ON DEFENDANTS  
UBER TECHNOLOGIES, INC., RASIER,  
LLC, RASIER-CA, LLC'S MOTION FOR  
SANCTIONS AGAINST BRET STANLEY**

Judge: Hon. Lisa J. Cisneros  
Courtroom: G-15th Floor

1 This cause coming before the Court on Defendants Uber Technologies, Inc., Rasier, LLC and  
2 Raiser-CA, LLC's Motion for Sanctions against Bret Stanley, due notice given and the Court being  
3 fully advised, THE COURT HEREBY FINDS:

4 1. Bret Stanley's violation of the Protective Order (ECF 176) caused Defendants to incur  
5 attorneys' fees and costs;

6 2. Bret Stanley's violations of the August 18, 2025 Order (ECF 3708) caused Defendants  
7 to incur attorneys' fees and costs;

8 3. Bret Stanley's violations of the Protective Order and August 18, 2025 Order were not  
9 "substantially justified" nor would "other circumstances make an award of expenses unjust;" and

10 4. The attorneys' fees presented to the Court in Defendants' Motion for Sanctions, in the  
11 amount of \$168,572.97, are sufficiently substantiated to illustrate the rates charged and the work  
12 performed, which the Court finds are reasonable pursuant to Fed. R. Civ. P. 37(b)(2)(c).

13 Therefore, pursuant to Federal Rule of Civil Procedure 37(b)(2)(C), THE COURT HEREBY  
14 ORDERS:

15 Bret Stanley shall pay Defendants, within thirty days of the entry of this Order, their reasonable  
16 attorneys' fees and costs, in the amount of \$168,572.97 incurred for: (a) investigating Mr. Stanley's  
17 Protective Order violations and attempting to compel Mr. Stanley to comply with the Protective Order  
18 without Court intervention; (b) drafting, filing, and arguing their Motion to Enforce Protective Order  
19 (ECF 3512) and related filings (Administrative Motion to Shorten Time, Motion to Seal, and Reply  
20 Supporting Motion to Enforce Protective Order); and (c) seeking to compel Mr. Stanley to perform  
21 the remedial measures required by this Court's August 18, 2025 Order (ECF 3708).

22  
23 **IT IS SO ORDERED:**

24  
25 Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. LISA J. CISNEROS  
United States Magistrate Judge